

**Lieff
Cabrer
Heimann &
Bernstein**
Attorneys at Law

Lieff Cabrer Heimann & Bernstein, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
t 415.956.1000
f 415.956.1008

January 13, 2021

Kelly M. Dermody
Partner
kdermody@lchb.com

VIA ECF

The Hon. Analisa Torres
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007-1312
Email: Torres_NYSDChambers@nysd.uscourts.gov

Re: *Chen-Oster, et al. v. Goldman, Sachs & Co.* No. 10-6950 (AT) (RWL)

Dear Judge Torres,

I write on behalf of Plaintiffs and the Class regarding Plaintiffs' proposed Reply in Support of Plaintiffs' Objections to the Magistrate Judge's Order Regarding Senior Leader Gender Animus Discovery. Plaintiffs' Motion for Leave and proposed Reply were filed today at ECF Nos. 1158 (publicly, with redactions) and 1159 (under seal, without redactions).

Consistent with Rule IV.A.ii of Your Honor's Individual Practices in Civil Cases, Plaintiffs met and conferred with Goldman Sachs via email on January 12, 2021 and January 13, 2021 regarding the sealing of Plaintiffs' filing. Goldman Sachs agreed that Exhibits A-C to the filing could be submitted publicly, but requested that Exhibit D and certain text from the Reply brief be submitted under seal because they contain material designated confidential by Goldman Sachs.

Plaintiffs oppose Goldman Sachs's request to seal Exhibit D and the text redacted from the proposed Reply brief.

Respectfully submitted,

/s/ Kelly M. Dermody
Kelly M. Dermody

cc: All parties, via ECF